

LOCAL RULE 16.1 JOINT STATEMENT

I. Joint Discovery Plan and Filing of Motions.

5. Defendant shall identify any expert witnesses pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure by July 1, 2022.

6. All expert depositions shall be completed by August 1, 2022.
7. Discovery shall be completed by August 1, 2022.
8. All dispositive motions, including motions for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, shall be filed (1) by September 1, 2022, with any opposition filed by October 1, 2022, or (2) not later than 30 days after compliance by any party who is ordered to act in accordance with any Order the Court issues pursuant to Rule 37 of the Federal Rules of Civil Procedure, whichever is later.

II. Other Issues.

The Court's December 6, 2021 Order (Doc. No. 11) states: "In addition [to the foregoing], the joint statement shall list all pending motions and shall also identify any matters that need to be discussed at the scheduling conference." The parties respectfully state (1) there are no pending motions, and (2) no other matters exist that need to be discussed at the scheduling conference (in which case, cancellation of the scheduling conference may be appropriate). The Order also states: "The parties' joint statement shall indicate whether all parties consent to reassignment of the case to a magistrate judge for all purposes." The parties respectfully state they do not consent to such reassignment.

III. Certifications.

The parties have conferred with their clients as to establishing a budget or cost for the litigation with respect to ADR programs. Certifications will be provided by independently, within five days of the filing of this Joint Statement.

Dated: December 23, 2021

Respectfully submitted,

PLAINTIFF
WESLEY CAMERON

By His Attorney,

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Respectfully submitted,

DEFENDANT
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By Its Attorney,

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CERTIFICATION

The undersigned hereby certifies a true and accurate copy of the foregoing document was filed using the Court's CM/ECF system on December 23, 2021, and that the Court's CM/ECF system will electronically notify all parties of record.

/s/ Jeffrey A. Fritz
Jeffrey A. Fritz